

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

Brock Fredin,

Plaintiff,

v.

Case No. 0:20-cv-01929-WMW-DTS

Jamie Kreil,

Defendant.

NOTICE OF RELATED CASES

Jamie Kreil respectfully notifies the Court that this case and *Fredin v. Middlecamp*, Case No. 0:17-cv-03058-SRN-HB, are related cases. The latter is already pending before U.S. District Judge Susan Nelson and U.S. Magistrate Judge Hildy Bowbeer. While reserving all rights and defenses, Kreil requests that this action also be assigned to those Judges, as the cases involve common parties, facts, and legal issues. Designating the actions as related cases will thus help preserve the Court's resources and guard against conflicting rulings.

In the *Middlecamp* action, Fredin sued Lindsey Middlecamp bringing claims for defamation, abuse of process, and intentional infliction of emotional distress stemming from social media posts Middlecamp shared via Twitter. See Complaint, *Fredin v. Middlecamp*, No. 0:17-cv-03058-SRN-HB, (D. Minn. July 18,

2017). In this case, Fredin brings the same claims against Kreil based on one of the same social media posts at issue in *Middlecamp*. See, e.g., Compl. ¶¶ 26-46.

In addition, Fredin's Complaint here relates to the *Middlecamp* litigation itself. Several of Fredin's claims against Kreil in this case stem from Kreil's declaration submitted in support of a motion for summary judgment in *Middlecamp*. See id. Ex. A. Fredin's Complaint further "asserts the applicability of equitable tolling as to the underlying statute of limitations" for his claims based in part on his "due diligence" in litigating the *Middlecamp* action. See id. ¶¶ 13, 32-34, 43-45. The resolution of this case will thus turn (in part) on the conduct of the parties in *Middlecamp*, regarding which Judge Nelson and Judge Bowbeer have already made relevant rulings. See, e.g., Order at 6, *Fredin v. Middlecamp*, Case No. 0:17-cv-03058 (D. Minn. Oct. 29, 2019) (denying Fredin's motion to take discovery out of time due to his "failure to commence discovery within the period allotted by the scheduling order").

Moreover, this case and *Middlecamp* are two of eleven cases Fredin has filed in this Court over the last three years concerning the same and related subject matter.¹ Many of these cases have involved the same or similar facts and

¹ See *Fredin v. Miller et al.*, Case No. 0:18-cv-00466-SRN-HB (D. Minn. Feb. 16, 2018); *Fredin v. Clysdale et al.*, Case No. 0:18-cv-00510-SRN-HB (D. Minn. Feb. 22, 2018); *Fredin v. Halberg Criminal Defense et al.*, Case No. 0:18-cv-02514-SRN-HB (D. Minn. Aug. 27, 2018); *Fredin v. Olson et al.*, Case No. 0:18-cv-02911-SRN-HB (D. Minn. Oct. 11, 2018); *Fredin v. City Pages et al.*, Case No. 0:19-cv-00472-DWF-TNL

legal issues. Judge Nelson and Judge Bowbeer have presided over the large majority of these cases.

Because this case and the *Middlecamp* action share common parties, facts, and legal issues, and because the claims and defenses here relate to the conduct of litigation in the *Middlecamp* action itself, the assignment of this case to Judge Nelson and Judge Bowbeer will promote the just, speedy, and efficient resolution of this action. Accordingly, Kreil respectfully requests that this case be assigned to Judge Nelson and Judge Bowbeer.

DATED: October 1, 2020

ROBINS KAPLAN LLP

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(D. Minn. Feb. 25, 2019); *Fredin v. Street et al.*, 0:19-cv-02864-SRN-HB (D. Minn. Nov. 8, 2019); *Fredin v. Miller*, Case No. 0:19-cv-02907-DWF-ECW (D. Minn. Nov. 14, 2019); *Fredin v. Miller et al.*, Case No. 0:19-cv-03051--SRN-HB (D. Minn. Dec. 9, 2019); *Fredin v. Halberg Criminal Defense et al.*, Case No. 0:19-cv-03068-SRN-HB (D. Minn. Dec. 11, 2019).